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SUPERIOR COURT OF NEW JERSEY

LAW DIVISION — BERGEN COUNTY

CLAIRE E. DEWEY, ADMINISTRATRIX OF THE ESTATE OF WILFRED E. DEWEY, DECEASED

v.

R. J. REYNOLDS TOBACCO COMPANY, R. J. REYNOLDS INDUSTRIES, INC., AMERICAN BRANDS, INC., ETC., AND BROWN & WILLIAMSON TOBACCO CORPORATION

Docket No. L-71733-81

DEPOSITION OF JEAN LONGAN

Deposition taken by subpoena at the law offices of McLane, Graf, Raulerson & Middleton, 40 Stark Street, Manchester, New Hampshire, on Thursday, July 25, 1985, commencing at 11:45 a.m.

Court Reporter:

Michele R. Bragan, CSR

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I N D E X

WITNESS: Jean Longan

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EXHIBITS FOR IDENTIFICATION:

None.

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APPEARANCES:

For the Plaintiff:	WILENTZ, GOLDMAN & SPITZER By: Alan M. Darnell, Esq. 900 Route 9 P.O. Box 10 Woodbridge, NJ 07095
For the Defendant R. J. Reynolds:	RIKER, DANZIG, SCHERER, HYLAND & PERRETTI By: Attorney Anne M. Patterson Headquarters Plaza II Speedwell Avenue Morristown, NJ 07960
For the Defendant American Brands:	KENNEY & KEARNEY By: John B. Kearney, Esq. Box 5034 Cherry Hill Plaza 1415 Route 70 East Cherry Hill, NJ 08034
For the Defendant Brown & Williamson:	ROSEN, WEISS, SLATTERY & BURSTEIN By: William C. Slattery, Esq. Gateway One Newark, NJ 07102
	- AND -
	SHOOK, HARDY & BACON By: Steven C. Parrish, Esq. Twentieth Floor Mercantile Bank Tower 1101 Walnut Kansas City, MO 64106
Also present:	ANDREW S. MINE, ESQ. 30 Rockefeller Plaza New York, NY 10112

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JEAN LONGAN

having been duly sworn by Mrs. Bragan, was deposed and testified as follows:

EXAMINATION

BY MR. SLATTERY:

Q. Your full name is Jean Longan?

A. Uh-huh, yes, it is.

Q. That's J E A N?

A. Yes.

Q. Okay. My name is Bill Slattery. I'm an attorney in New Jersey, and I represent Brown & Williamson Tobacco Corporation. With me for Brown & Williamson is Mr. Parrish, he's to my right, and the other people in the room represent the other defendants in this case. Mr. Darnell represents the plaintiff, Claire Dewey. Miss Patterson, who is next to Mr. Parrish, represents R. J. Reynolds. Mr. Mine and Mr. Kearney represent American Brands.

What we're doing now is taking your deposition. It's just a fancy word for your sworn testimony, and the purpose of this is to find out any facts that you may have knowledge of which are relevant to the lawsuit that Claire Dewey has filed

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against the three tobacco companies that are represented here. And the way we proceed is, I will ask questions, and when I finish my question, you will be required to answer. Of course, if you don't know the answer, you can just say: I don't know the answer, but in order to do that you have to speak the answer rather than nods or gestures or the kinds of things we frequently use in discourse. You can't use them here because this young lady has to take everything down. So you understand that?

A. Yes, I do.

Q. Good. If you don't understand any of my questions, please tell me and I'll try to rephrase them and make them understandable.

If by any chance one of the attorneys should object to a question I ask, please withhold your answer until we get the objection on the record, and in all likelihood you'll be instructed to answer at that point. Do you understand that?

A. Yes.

MR. DARNELL: Just one more thing. Nobody in this room wants you to guess or speculate. If you don't recall or you don't know an answer,

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just tell us that. If you can give us a best estimate or a best recollection, then of course we would like you to do that.

THE WITNESS: Okay.

Q. BY MR. SLATTERY: Mrs. Longan, you are the wife of Thomas Longan?

A. Yes, I am.

Q. And you reside at 24 Wethersfield Road, is it?

A. Yes.

Q. In Nashua, New Hampshire?

A. Yes.

Q. And you've lived there approximately 18 years?

A. Yes.

Q. Do you know Claire Dewey?

A. Yes, I do.

Q. Can you tell me as best you can remember it when you first met Mrs. Dewey?

A. I met Mrs. Dewey when her son was five. We met because of car pooling with kindergarten. Her son Billy and my daughter Erin went to school together, so --

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Q. That would be your daughter Erin?
A. Yes.
Q. And your husband gave us the name of a kindergarten, Little Pilgrim. Is that the one?
A. Yes, uh-huh.
Q. Is that still there?
A. I believe it is.
Q. Can you tell us where it's located?
A. That would be exit seven in Nashua. I'm not sure of exactly the street.
Q. Your husband seemed to think it was at a church.
A. I think The Little Pilgrim Church is -- I think it's affiliated with the church.
Q. That's the name of the church as well?
A. I believe so.
Q. How did you come to find out that Mrs. Dewey's boy Billy was going to the kindergarten and might be interested in car pooling with you?
A. I believe she approached me. She probably checked with the personnel there and was interested in it rather than driving separately every day.

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Q. She found out there was somebody in her neighborhood that was also going there?
A. That's as I remember.
Q. How long a distance from your home to the school was it?
A. Maybe about four miles.
Q. And would she drive one day and you drive the next or --
A. I don't remember how we did that.
Q. But you alternated?
A. Yes.
Q. Starting with that contact, did you develop a friendship with Claire Dewey?
A. Yes, we did.
Q. Did you eventually have your respected husbands meet each other?
A. Yes, we did.
Q. Did they become friendly as well?
A. Yes.
Q. Were they as -- as friendly as you and Claire were, in your opinion?
A. I don't think so.
Q. Okay. Am I correct that the contact

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between the Longans and the Deweys was primarily between the wives?

A. For the most part.

Q. And the husbands would be together in social occasions?

A. Yes.

Q. But not as frequently as you two?

A. No.

Q. Okay. Did Claire tell you anything about her son Billy's health when you first met her or even subsequently?

A. I don't remember that she said anything specifically then, no.

Q. Was he a healthy boy based on your observations?

A. I wasn't aware that he had anything unusual, you know, any disease or anything. As far as I knew, he was.

Q. Did she ever tell you that he was born prematurely?

A. Yes, she did.

Q. Did he have problems thriving as related to you by her?

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A. I don't recall that.

Q. Do you recall anything else she said about his prenature birth?

A. No, I don't.

Q. Okay. Was he ever sick, to your knowledge, seriously sick while you knew Claire and they were living in New Hampshire?

A. Not that I recall.

Q. Now, I -- when you first met her, is it correct that they were living, the Deweys, on Margate Road in Nashua?

A. Yes.

Q. And they lived there for approximately two or three years; is that correct?

A. Could be. I don't know exactly how long.

Q. Okay. And then they moved elsewhere in Nashua?

A. Yes, they did.

Q. Did you remain friendly with Claire when they moved elsewhere?

A. Yes.

Q. In other words, off of Margate Road, some other address?

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A. Yes, we did.

Q. And did you remain in contact with her when the Dewey family moved to New Jersey?

A. Yes.

Q. Did you visit them in New Jersey?

A. Yes, a few times.

Q. How many times?

A. A few times.

Q. Did they visit you in New Hampshire once they went to New Jersey?

A. I think they were up once or twice. I don't recall, you know, exactly.

Q. Did you ever, while Claire was living on Margate Road, discuss with Claire her husband Bill's employment?

A. No, not that I recall.

Q. Did she ever express to you her views about the kind of job he had, the amount of money he made and how happy he was, anything about his job?

A. No.

Q. What about any other time after Margate Road but in New Hampshire, did she ever relate any information to you about her husband's work?

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A. I don't recall that she did.

Q. Did she discuss any other facts about her husband with you other than work?

A. I don't recall. It was quite so long ago.

Q. Okay. What did you talk about when you saw her?

A. Oh, mostly the children, and we both liked cooking, so, you know, we'd talk about things like that. Again, it was a long time ago. It's sort of difficult to recall.

Q. Okay. Did you know where Bill Dewey, Sr. worked when they were on Margate Road?

A. Yes, I knew he worked at Sanders.

Q. Did you learn that from him, or from Claire?

A. Oh, probably from Claire since I met her first.

Q. Now, do you recall Bill leaving Sanders and eventually going with an outfit called Proud Foot?

A. Yes, I do.

Q. Do you recall he was away from home frequently when he was with that company?

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A. Yes, he traveled.

Q. Did Claire ever discuss his job at Proud Foot with you?

A. No, she didn't.

Q. Did she ever say anything to you about the fact that he was away from home frequently?

A. Well, I knew that, you know. She did say that he was away and was home on weekends, and usually it's a little bit more difficult with children when, you know, your husband's away, so she had made mention of that.

Q. But she didn't complain to you about the fact that he was away all the time?

A. Not that I recall.

Q. Now, did you at some point learn that Bill had accepted a position in New Jersey?

A. Yes.

Q. Can you tell me how you learned that?

A. From Claire, I would imagine.

Q. Do you recall what she said to you about the job that he was going to accept in New Jersey?

A. I don't remember what her feelings were. Really, I don't know.

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Q. You don't remember what her feelings were?
A. No, I don't.
Q. Do you recall her saying anything about it was a -- a very good job or an excellent opportunity or advancement or anything of that nature?
A. It did seem -- it sounded as though it was a good future for him at the time.
Q. Do you recall what the -- what the company was that he was to go with in New Jersey?
A. I believe it was Lazzara's Bakery.
Q. Did you ever have a discussion with Bill about the job at Lazzara's that he was going to take?
A. No.
Q. Did you ever discuss any of Bill's work with Bill?
A. No.
Q. Now, am I correct that Bill Dewey accepted the job with Lazzara and the family did move to New Jersey?
A. Yes, they did.
Q. So we agree on that.
Do you recall hearing from Claire that

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the job that Bill had taken at the bakery had not worked out the way that they had expected?

A. Well, at some point it became evident. I don't, you know, just remember the details, but there were problems from the company, from what I recall.

Q. How did it become evident to you?

A. She either told me or wrote, I don't remember which. We did correspond by writing also.

Q. Did you keep the letters that she sent you?

A. No.

Q. Have you kept any letters that she sent you?

A. No, I don't.

Q. But she would, in fact, write a letter as opposed to a note to you?

A. More economical. Oh, I thought you meant as opposed to a phone call.

Q. Well, as opposed to a phone call, sure, she would actually correspond by letter?

A. Yes.

Q. And you would answer it by letter?

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A. Yes.

Q. And you learned probably in that way that the job at the bakery had not worked out to Bill's expectations?

A. Yes.

Q. Okay. Do you recall what -- what she said had happened?

A. I don't really remember exactly. I think there was something to do with the family or Lazzara's, and somehow financially it just didn't work out. I don't remember what the details were.

Q. Did you learn that Bill eventually no longer was working at the bakery?

A. Yes.

Q. Did Claire tell you what he was doing when he ceased working at the bakery?

A. I knew -- I think he was -- he was writing, I guess, and I do remember he did work as -- I'm trying to think of what it was. A dispatcher.

Q. Is that for the taxi company?

A. Uh-huh, yes.

Q. You say he was writing. Is this a novel?

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A. It was a book. I don't know if it was a novel or biography or just what it was. It might have been a novel.

Q. Do you recall what Claire told you about the book that he was writing?

A. No, I don't.

Q. She did tell you he was writing a book, however?

A. Yes.

Q. You don't know what kind of a book it was?

A. I thought it was a novel. I don't recall what the subject was.

Q. Okay. Do you know whether he was writing that while he was working at the taxi company?

A. It seems as though he was doing that at that time, I thought.

Q. Do you recall what type of job he had at the taxi company?

A. The only recollection I have is that he was a dispatcher.

Q. Do you recall the name of the company?

A. I don't think I ever knew it.

Q. Do you know for how long he did that?

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A. I don't think it was very long. I really don't recall, you know, how long.

Q. Do you recall any other jobs that Claire told you Bill had held after the bakery?

A. I thought he went to work in New York then for Merrill Lynch. I think that was his next job.

Q. Okay. Other than the -- other than the taxi company and Merrill Lynch, you -- you cannot recall Claire telling you of any other jobs that he held after the bakery?

A. Not that I recall, no.

Q. Do you know whether he was unemployed for any period of time in excess of a month after leaving the bakery?

A. I don't know.

Q. Do you recall Claire ever telling you that Bill had been out of work for X months?

A. I don't recall if she did.

Q. Do you recall Claire telling you that the family was in difficult financial straits subsequent to Bill's leaving the bakery?

A. Probably, yes, because they did move from

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the one house to another.

Q. That's from the house in Franklin Lakes?

A. To Wyckoff, I believe.

Q. To the house in Wyckoff.

And you took that as an indication that their financial situation was not good?

A. I would think so.

Q. Do you recall anything that Claire said specifically with respect to the subject that their -- of their financial condition?

A. No, I don't.

Q. Did Claire ever tell you that Bill had to borrow money from various members of his family?

A. I don't recall whether she did. No.

Q. Do you recall that -- whether or not when Bill Dewey lived in New Hampshire he smoked cigarettes?

A. I think he always did smoke as long as I remember knowing him.

Q. Do you ever recall any time at which he had stopped smoking cigarettes?

A. No, I don't.

Q. Did you ever hear Claire and Bill discuss

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Bill's smoking of cigarettes?

A. No.

Q. Did you ever hear Claire -- rather, let me withdraw that.

Did Claire ever say anything to you about her husband's smoking?

A. Not that I recall.

Q. Do you ever recall her saying to you that she had asked Bill to stop but he wouldn't?

A. No, I don't.

Q. Do you ever recall Claire saying to Bill: Please stop smoking, I don't like it, or words to that effect?

A. No, I don't.

Q. Did Claire ever say anything to you about Bill's attempting to stop smoking?

A. Not that I recall.

Q. When did you first learn that Bill Dewey was seriously ill?

A. I don't remember exactly when it was. Might have been in the spring, I'm not really sure, of the year he passed away.

Q. And how did you learn that?

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A. I don't know if she wrote or called. I think she might have called at that time because she was upset that he was sick. I guess he had gone away for a while to rest, she thought.

MR. KEARNEY: Excuse me, ma'am. Could you keep your voice up?

THE WITNESS: I'm sorry.

MR. KEARNEY: Thanks.

Q. BY MR. SLATTERY: Did she say what was -- it was that causing him to be sick?

A. The doctor said he may have been overworked and needed a rest.

Q. He was not, I take it, in the hospital at that point?

A. No.

Q. Do you recall how -- did you eventually learn that he was hospitalized?

A. Yes, I did.

Q. Do you recall how long before his being hospitalized you had this conversation with Claire in which she said the doctor said he needed a rest?

A. I don't know. Might have been few months, maybe. I really don't remember the dates.

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Q. How did you learn that he had been hospitalized?

A. Again, I don't recall whether it was by phone or letter.

Q. Do you recall what -- either a phone call or a letter from Claire --

A. Yes.

Q. -- to you?

A. Yes.

Q. Do you recall what she said the reason for this hospitalization was?

A. I guess he was coughing and she didn't know, you know, just what it was that he had, but it seemed not to have gotten better when he was away, and I don't remember now if she said just what he had, if they thought it was pneumonia or something like that.

Q. Did she ever at any point prior to Bill's death tell you that Bill had cancer?

A. I think I may have known shortly before his death that he was diagnosed as having cancer.

Q. And that would have been from Claire?

A. Yes.

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Q. After Bill Dewey died, did you receive a communication from Claire, either telephone or letter or face to face, in which she said she was contemplating filing a lawsuit as a result of Bill's death?

A. She did mention something in a letter to that effect.

Q. Can you tell me as best you can recollect it what she said about that subject?

A. She didn't -- wasn't very explicit with it. She did say something about a lawsuit, and at the time I thought it was for malpractice because the first doctor had not diagnosed Bill correctly.

Q. Do you know whether she ever had, in fact, pursued a malpractice claim against the doctor?

A. No, I don't know.

Q. Other than that which you believe was a letter which she mentioned it, did you have any other communications from her about the doctor's diagnosis and possible malpractice?

A. I don't recall that I did. It seemed a long time before I became aware of it even anymore, you know.

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Q. Other than yourself, can you tell us who Claire's close friends in the Nashua, New Hampshire, area were?

A. There was a Mrs. Corbit and Doris Upton.

Q. That's Doris?

A. Upton. And there were some friends she had over at the Villas, but I don't recall their names.

Q. The Villas is the apartment --

A. Yes.

Q. -- where they lived?

A. Uh-huh. Those were the only two I seem to recall now.

Q. Did Claire ever discuss with you Bill's reaction to the failure of the Lazzara Bakery job?

A. No, she didn't.

Q. Do you recall her ever saying anything to you about the bakery having failed and Bill having lost his job there?

A. I don't recall if she did. It's so long ago.

Q. Did Claire Dewey work while they lived in New Hampshire?

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A. She did work for a while at -- I think it was Friendly's at the Royal Rige Mall. I think she worked there for a short period.

Q. What was the name of the mall?

A. Friendly's.

Q. What was the name of the mall?

A. Royal Ridge Mall, R O Y A L.

MR. DARNELL: Is that the Friendly Ice Cream Stores?

THE WITNESS: I think it was either Friendly's or Deerings.

Q. BY MR. SLATTERY: Was Deerings also a ice cream operation?

A. Yes.

Q. Was she a counter person there?

A. Yes.

Q. Do you know how long she worked there?

A. No, I don't.

Q. Do you recall --

A. Maybe a year or two. I'm not sure.

Q. Do you recall any other jobs that she had in the Nashua area?

A. Not that I can think of.

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Q. Other than that year or two that she worked, was she at home?

A. Yes. She did volunteer work at the hospital also one day a week.

Q. What hospital was that?

A. I believe it was at Memorial.

Q. Nashua Memorial?

A. Memorial Hospital in Nashua, yes.

Q. Did she ever express to you her views about her work?

A. Not that I recall.

Q. Did you work when -- during the period that the Deweys lived in New Hampshire?

A. No, I did not.

Q. Do you know whether Claire worked after the Deweys moved to New Jersey?

A. I don't recall that she did.

Q. Do you recall Claire saying to you that she had to get a job because Bill was out of work from the bakery?

A. No, I don't.

Q. As far as -- you have no information that she ever did get a job while in New Jersey?

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A. I think she did -- did she work in a dress shop or a children's clothing store? It seems to me she worked for a while down there.

Q. That's something you recall her telling you?

A. Yes.

Q. Any other jobs that you can recall her telling you that she had in New Jersey?

A. No, that's the only one I remember except for now after his death.

Q. Was Bill Dewey, to your knowledge, involved in any volunteer or charitable work while he lived in New Hampshire?

A. Not that I recall.

Q. Do you recall Bill Dewey getting involved in a franchise operation called Bestline?

A. Yes.

Q. Do you recall Bill trying to get your husband involved in that venture?

A. Yes, he did.

Q. Did you ever discuss that with Claire?

A. No.

Q. Did you ever discuss it with Bill?

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A. No.
Q. What about with your husband?
A. Briefly. He didn't seem interested in it.
Q. And that was it, he just didn't seem interested?
A. Well, he didn't think it was a good idea.
Q. Did he say he told Bill Dewey that?
A. I believe he did. I don't know, he just didn't do it. I don't know just what he told Bill.
Q. Did Claire ever tell you that Bill had lost money in the Bestline deal?
A. Yes, she did, because I know he had leftover products when he stopped selling it.
Q. Did Claire appear upset that he had lost money in that deal?
A. I don't recall whether or not she was.
Q. Do you know how much money was involved?
A. No, I don't.
Q. Do you know whether the failure of the Bestline deal had anything to do with them selling the house on Margate Road?
A. I don't know why they sold that. I thought that was sold when he was with Sanders, I

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recall. Seemed they weren't there too long after we moved there.

Q. All right. So as far as you know, it had no connection, Bestline and the sale of --

A. Not that I know of.

Q. Did Claire ever discuss with you Bill's mother and father?

A. A little bit.

Q. Did she tell you anything about Bill's relationship with his father?

A. Well, it was more the fact that he had worked for his dad when they lived in Texas.

Q. What did she tell you about that?

A. Well, I guess they had a laundry business, I believe, laundromat. Or was that in New Hampshire? Maybe -- I don't remember. Just I know there were laundromats at one time, a laundromat business. I don't know if that was in Texas or if that was up here, and I guess -- I don't know for what reason, he just no longer worked there and they came to New England.

Q. Did she ever say that Bill and his father had a falling out, words to that effect?

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A. Not that I recall.
Q. Did you ever meet Mr. Dewey, Sr.?
A. At the funeral.
Q. That's the only time?
A. Yes.
Q. In all the time you knew Claire Dewey, do you ever recall her complaining about Bill in any way?
A. I can't recall that she did. She seemed to be rather private about her private life.
Q. Would you say that you were more friendly with Claire than Mrs. Corbit, or was Mrs. Corbit more friendly with Claire, in your view?
A. Mrs. Corbit knew her longer. They had met before I met Claire, so I really couldn't say, you know, which one of us was friendlier.
Q. What about whether Mrs. Upton was closer to Claire than you or Mrs. Corbit or not?
A. I don't know about that either. I know they saw them socially. I think they met through New Commerce Club, but I don't know how much Claire saw them as opposed to seeing me.
Q. Do you remember Bill Dewey was involved

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with the Boy Scouts while he was in New Hampshire?

A. I don't recall that, no.

Q. Do you recall Bill being involved in any activities with his son Billy, Little League or Boy Scouts?

A. No, I don't.

Q. What about Bill's involvement with theater groups in Nashua?

A. He was involved in a theater group, yes. I think it was The Actors Center.

Q. Was he in the actual productions?

A. Yes.

Q. Did you go to them?

A. We saw one.

Q. Do you recall what his role was?

A. No, I don't.

Q. Did you ever observe Bill Dewey barbecuing food in the back yard of his home?

A. Yes.

Q. Did he do that on a frequent basis?

A. That I don't know. I don't know. I know he did it occasionally if people were there for dinner.

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Q. Did he ever say that he really enjoyed charcoal-broiled food?

A. I don't know if he said it. I think he liked it if he did it.

MR. SLATTERY: Why don't we take just a couple minutes.

(Discussion off the record.)

(Recess taken.)

MR. SLATTERY: I have no further questions.

MS. PATTERSON: Mrs. Longan, my name is Anne Patterson. I represent R. J. Reynolds Tobacco Company. I just want to ask you a couple questions. I hope it won't be too long.

EXAMINATION

BY MS. PATTERSON:

Q. I'd like to get a sense of the type of person Mr. Dewey was.

MR. DARNELL: You used the word "sense." I would ask the --

MR. PARRISH: She was just making a statement. Overruled.

MR. DARNELL: The word "sense" was in the

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question.

Q. BY MS. PATTERSON: I would like to understand --

MR. DARNELL: Much better.

MS. PATTERSON: I appreciate your approval, Mr. Darnell.

Q. BY MS. PATTERSON: I would like to understand the type of person Mr. Dewey was, and I just want to ask you a few questions about that.

Would you consider him a bright person?

A. I thought he was, yes.

Q. Would you say he was an intelligent person?

A. I would think so. I don't know why. It's just from observing, I guess. I don't have any specific reasons for saying that.

Q. And what we're asking for are your observations, and that's perfectly correct.

A. Yes.

Q. Was he a decisive person? By that I mean would he make decisions and stick to them generally?

A. I think so.

Q. Was he a disciplined person?

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A. I think he was, yes.
Q. Was he well-read?
A. I know that he read. I don't know how much.
Q. For example, would he be interested in current events?
A. That I don't know, more specifically.
Q. Do you ever remember discussing politics with him?
A. No, I don't.
Q. Would he read the newspapers in your observation?
A. I don't recall that since we saw him socially most of the time.
Q. Was he a strong person?
A. Do you mean physically, or --
MR. DARNELL: Thank you. I had the same question.
Q. BY MS. PATTERSON: I would say mentally strong in terms of his personality. Did he have a strong personality?
A. I would think so. You get that feeling, yes.

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Q. Was he an independent person?
A. I think he was.
Q. Was he strong-willed in the sense of when he made a decision would he be tenacious in pursuing that?
A. I would think so.
Q. Would you say he was a fickle person?
MR. DARNELL: Do you want to define "fickle?"
Q. BY MS. PATTERSON: Capable of having one's mind changed by events easily, indecisive.
A. I wouldn't think so.
Q. He would have been the opposite of that?
A. Yes.
Q. Okay. During the years of your friendship with him, would you have considered him a warm person?
A. I would say a friendly person. I don't know -- again, you know, not seeing him very often I don't know how I could answer that, but he was very friendly.
Q. Did he make friends easily?
A. Yes.

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Q. Was he the type of person who was interested in what other people were doing and what was going on in their lives?

A. Yes, I think he was. He wasn't one-sided.

Q. Open-minded, would you say?

A. I would think so, yes.

Q. Was he a distant person, little bit distant from his friends? Would he hold things back?

A. That I don't know. I don't think I ever, you know, had occasion to be aware of that.

Q. Would you characterize him as aloof in any way?

A. No, I wouldn't think that.

Q. Was he articulate?

A. Yes, I would say so.

Q. Could he make an argument and express an opinion clearly to other people?

A. I don't recall if I ever was in such a situation to make such an assessment.

Q. For example, perhaps if -- if he and your husband were discussing business in a situation which you were present, do you remember any kind of discussions in which he would be making an argument,

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making a point?

A. I don't recall.

Q. Now, I got the impression from your testimony that you are -- are still a close friend of Claire Dewey's; is that correct?

A. Yes.

Q. And you've kept your relationship going with Claire --

A. Yes.

Q. -- since you -- since they left New Hampshire, and you're still a good friend of Claire's?

A. Yes.

Q. And you correspond with Claire?

A. Yes.

Q. How often do you talk on the telephone with her, let's say, in 1985?

A. Not at all. Mostly it's by letter, very infrequently by phone.

Q. Have you spoken to her by telephone in 1985?

MR. DARNELL: She said she hasn't. She just answered the question, I thought.

THE WITNESS: I just recall now that I

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did, yes.

MR. DARNELL: Never mind.

Q. BY MS. PATTERSON: Can you remember why you called her or she called you?

A. I think I had called her when we were subpoenaed and just wanted her to be aware of the fact.

Q. Now, was that the first conversation you ever had with her in relation to this lawsuit?

A. I don't recall if it was the first conversation, but -- because mostly we would write. It may have been.

Q. I'll get to the letters in just a second, but do you remember what Claire said -- you called her, I'm sorry.

A. Yes, I did.

Q. Do you remember what you said to Claire?

A. I just told her that we had been subpoenaed.

Q. Do you remember what she said to you in response?

A. She just said, you know: Don't worry about it, it's nothing to worry about. Just say

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whatever you remember.

Q. Did she tell you anything about the lawsuit beyond that?

A. No, she didn't.

Q. So that was the conclusion of the conversation?

A. Yes, it was.

Q. Just that exchange. Okay.

Now, you mentioned there have been letters back and forth.

A. Yes.

Q. Have any of those letters dealt in any way with this lawsuit?

A. No, not really. It's mostly personnel.

Q. But I understand the main thrust of it is obviously personal and what your children are doing and so forth?

A. Yes.

Q. But to your recollection has there been any letter to or from Mrs. Dewey that had to do with this lawsuit?

A. I don't believe so, which is why I called her, because I didn't realize, you know, even how

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far it had gone or what was happening until we heard.

Q. And did you ask her when you called her how far it had gone and what was happening?

A. No, I didn't.

Q. Were you curious, having gotten the subpoena?

A. Well, I was a little bit surprised, I would say, about that.

Q. Did you ask her anything about what had gone on in the suit so far?

A. No, I did not.

Q. Did you ask her whether you were the first person --

A. I did ask her. She volunteered and said that a lot of other people had been subpoenaed also as well as relatives.

Q. Did she tell you specifically who had been subpoenaed?

A. She mentioned Bill's parents and I think some friends of theirs on the Cape.

Q. Okay. Did she tell you anything about the depositions that had taken place?

A. No, not -- just -- you know, I didn't

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even know what a deposition was at the time, and she said it was in lieu of going to court and that was about, you know, it.

Q. Did she tell you anything about what other people had been asked in connection with this lawsuit?

A. No.

Q. Did she tell you anything about what kinds of issues had arisen in the lawsuit?

A. No, she didn't.

Q. Did she tell you how long it had been going on?

A. No.

Q. Did you ask?

A. I didn't ask, no.

Q. Okay.

A. I really didn't see, you know, any need for it.

Q. Did she tell you who her lawyers were?

A. She may have. I don't recall whether or not she did.

Q. Going back for a moment to the letters, I think you said you don't recall any mention in the

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letters about the lawsuit at all.

Over the years you've written to Claire, she's written to you --

A. Uh-huh.

Q. -- how often would there be an exchange of letters?

A. Maybe two or three times a year.

Q. When you get a letter from Claire, would you read it and then immediately dispose of it?

A. No, I usually keep it until I answer it and then dispose of it.

Q. As of this moment, as best as you can recall, do you have in your possession any letters from Claire?

A. I'm not sure. I might have one.

Q. Okay. Do you remember when that was written?

A. No, I don't.

Q. Any special reason why you kept that letter?

A. I probably haven't answered it yet.

Q. Do you remember what that letter had in it -- has in it, since it now exists?

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MR. DARNELL: I'm going to object unless it relates to the issues involved in this lawsuit.

Q. BY MS. PATTERSON: You can answer, Mrs. Longan.

A. I really don't remember because it's been a while. I probably -- you know, pertaining to the children and what they were doing, and I think she mentioned something about her job and her working.

Q. Were you ever curious to know what happened, if anything, about a possible malpractice suit against that doctor that she mentioned?

MR. DARNELL: Objection. This witness' curiosity is absolutely irrelevant to the issues in the lawsuit.

MS. PATTERSON: May I rephrase, Mr. Darnell?

MR. DARNELL: She can answer it.

MS. PATTERSON: No, I'd rather rephrase.

Q. BY MS. PATTERSON: Did you ever ask Claire either in a letter or by -- in a phone conversation what, if anything, had happened with regard to a lawsuit against the doctor?

A. I believe I may have asked her, you know,

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right after Bill passed away and when I became aware of the fact that there was a lawsuit, but as I said, Claire was not one to discuss personal things too readily, so I just really didn't pry.

Q. Did she say: I'd rather not talk about that, something along those lines?

A. Well, I really wouldn't even ask her unless she brought it up. You know, I may have questioned her in general, but it was nothing I would pursue. I just, you know, got the feeling that she would rather not talk about things like that, so --

Q. I'm just curious because you mentioned you thought you recalled a conversation. Did she bring that up with you at all?

A. Did she bring what up?

Q. The subject of the possible malpractice suit.

A. I don't remember now whether or not it was by mail or by phone, but it was, you know, a little while after Bill passed away that I became aware of it, but I was not too familiar with what was progressing until we were interviewed sometime

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after that.

Q. When you got a subpoena and it had a name of a case and so forth on it and had Claire's name on it, did you assume that that was the same lawsuit that she had been talking about that would have involved the doctor?

A. Well, I think I knew it had progressed when we heard from the R. J. Reynolds people. I was aware then that that was not a malpractice suit but it had gone on further.

Q. When you called Claire, did you ask her anything about what relationship this might have had to what happened with the doctor?

A. No, I didn't.

Q. When did you determine that this was a lawsuit against tobacco companies rather than a lawsuit against a physician?

A. Well, somebody came to interview us at home a few years ago from R. J. Reynolds Tobacco, and I think it was then that I was made aware of it.

Q. Did you read the letter that -- I believe there was a letter -- strike that, please.

I recall you testifying that there was

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something about a letter Bill had written with regard --

MR. DARNELL: I don't know if that was her testimony or her husband's testimony.

MS. PATTERSON: Sorry.

Q. BY MS. PATTERSON: Did Claire ever show you any letter that Bill Dewey had written to a physician in connection with his treatment?

A. No.

MS. PATTERSON: I think that's all I have, Mrs. Longan. Thank you.

MR. KEARNEY: Ma'am, my name is John Kearney. I represent American Brands.

EXAMINATION

BY MR. KEARNEY:

Q. You indicated that you and Mrs. Dewey shared a common interest in cooking.

A. Yes.

Q. Do you know what kinds of foods Mrs. Dewey prepared for her family?

A. Oh, I don't think they were out of the ordinary, but when, you know, she had company, then I would say it was varied, seafood or poultry,

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beef --

Q. Did she have any specialities in ethnic foods that she served such as Mexican food or Chinese food or some other kind of food?

A. Not that I recall.

Q. Do you know if she served the food to the family highly seasoned?

A. I don't recall that she did.

Q. Did she ever tell you whether there were any foods that her husband couldn't eat?

A. I don't recall.

Q. Did you ever hear Bill Dewey say that he wanted to stop smoking but he couldn't?

A. No, I don't.

Q. Do you recall what brand or brands of cigarettes Bill Dewey smoked?

A. No, I don't know.

Q. Do you know how many cigarettes he smoked on a daily basis during the time that you observed him smoking?

A. I'd say frequently. I don't know how many because it was usually not a length of a day, you know, maybe a few hours on a visit. I don't

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know whether he smoked the same way during the day.

Q. Could you estimate how many cigarettes he smoked in this few hours that you visited on those occasions?

A. I don't really know.

Q. Okay.

A. It's sort of hard to say.

Q. Did you ever see Mr. Dewey carrying a pack of cigarettes around with him in a pocket or in his hand?

A. I don't recall, but I would think he had them with him if he --

Q. I only want to know what your recollection is.

Claire Dewey ever smoke cigarettes?

A. Not to my knowledge.

Q. Did you ever see Mr. Dewey smoke a pipe?

A. I don't remember whether he may have or not. It almost seems that he might have on occasion, but I'm not really positive again.

Q. Did you ever see him smoke a cigar?

A. No.

Q. Claire Dewey ever say to you that she

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thought cigarette -- smoking cigarettes wasn't good for one's health?

A. I don't recall that she did.

Q. Do you recall what Mrs. Corbit's first name is?

A. I did know it at the time. It might come to me later.

Q. Okay. Did either Bill or Claire Dewey ever mention anyone else from Bill's family that had cancer?

A. No.

Q. When Bill and Claire Dewey were living in Nashua at the various locations, do you know if Bill ever did any painting either inside or outside the house?

A. I don't recall that he did.

Q. Did he ever do any work insulating any of these places where he lived?

A. No.

Q. Claire Dewey ever talk to you about her marriage to Bill, that is, the actual wedding?

A. No.

Q. Before your testimony was taken here

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today, did you and your husband talk about the deposition and what areas you thought might come up?

A. No.

Q. Didn't discuss it at all the fact --

A. We discussed that, but, you know, we didn't discuss any specific aspects of it.

Q. Did you and your husband try to recall any names or places or anything regarding the Deweys before you got here today?

A. No.

Q. No.

One second, please.

Your husband told us that at some point in time he stopped smoking cigarettes. Is that your recollection?

A. Yes.

Q. After he stopped smoking cigarettes, do you know of anyone he ever talked to in which he told them they should stop smoking cigarettes also?

A. I don't recall, you know, hearing him say that. I don't know.

Q. Was your husband proud of the fact that he stopped smoking cigarettes?

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A. I don't know if he was proud. I think he just became aware of the fact that it wasn't healthy and just stopped on his own.

Q. Uh-huh. Do you know how your husband became aware that smoking cigarettes wasn't healthy?

A. Probably by the media.

Q. Did you see things in the media that said smoking wasn't good for your health around the time that your husband quit?

A. I don't actually recall the time, you know, just when he stopped smoking.

Q. Do you know what work Claire Dewey did as a hospital volunteer?

A. I think she worked in the -- wasn't the cafeteria, was the snack shop, I believe.

Q. Uh-huh.

A. The gift shop maybe.

Q. Do you know if she had any contact with patients in any of the areas or wards of the hospital?

A. Not that I'm aware of.

MR. KEARNEY: Thank you.

MR. DARNELL: Thank you. I have no

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questions.

_____
Deponent

STATE OF_____

COUNTY OF_____

Subscribed and sworn to before me this_____ day of_____ , 19_____ .

_____
Notary Public
Justice of the Peace

My Commission Expires:_____

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C E R T I F I C A T E

I, Michele R. Bragan, a Certified Shorthand Reporter and Notary Public of the State of New Hampshire, do hereby certify that the foregoing is a true and accurate transcript of my stenographic notes of the deposition of Jean Longan, who was first duly sworn, taken at the place and on the date hereinbefore set forth.

I further certify that I am neither attorney nor counsel for, nor related to or employed by any of the parties to the action in which this deposition was taken, and further that I am not a relative or employee of any attorney or counsel employed in this case, nor am I financially interested in this action.

Michele R. Bragan

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